

EXHIBIT B

From: [Papez, Elizabeth P.](#)
To: [Garnett, Stanley](#); [Andrews, Travis](#); gbrower@bhfs.com; [James Trusty](#); [George Calhoun](#)
Cc: [Stokes, Patrick F.](#); [Barrett, Claudia M.](#)
Subject: RE: Bond update
Date: Monday, June 15, 2020 8:11:24 PM

Stan – we hope you had a nice weekend. I write in follow up to your message below concerning Defendants’ bond application, because it has now been 10 days since the Court entered the June 5 PI.

Reserving all rights, we remain committed to reaching agreement where possible on compliance with the order. To that end, can you please provide the following by close of business tomorrow, June 16:

1. The current status of your clients’ bond application, including the amount, if any, that IMA or any other surety company or underwriter has approved for judgment security in this action;
2. A report listing all assets identified to, or otherwise considered by, IMA and/or any other insurance or surety provider in support of your clients’ bond application or other efforts to comply with the judgment security requirements in Paragraph 2 of the PI, including all assets listed on the financial statements for Defendants Watson and WDC/Northstar you stated you were preparing in May;
3. A copy of the D&O insurance policy that your June 4 email described as likely to cover the claims at issue in this case and potentially helpful in securing the bond your clients have requested; and
4. A statement as to whether the estimated net present value of assets in your clients’ possession, custody, or control has changed by an estimated amount equal to or greater than \$100,000 since May 21, 2020 and, if so, the direction and reason(s) for the change.

Thanks and regards,

Elizabeth P. Papez

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From: Garnett, Stanley <SGarnett@bhfs.com>

Sent: Friday, June 12, 2020 3:11 PM

To: Andrews, Travis <TAndrews@gibsondunn.com>; gbrower@bhfs.com; James Trusty <jtrusty@ifrahlaw.com>; George Calhoun <george@ifrahlaw.com>

Cc: Papez, Elizabeth P. <EPapez@gibsondunn.com>; Stokes, Patrick F. <PStokes@gibsondunn.com>; Barrett, Claudia M. <CBarrett@gibsondunn.com>

Subject: Bond update

[External Email]

Elizabeth,

Our client has been advised by the bonding agents that any bond that could be issued would need to be 100% secured. As of COB yesterday, they had not identified sufficient assets for Brian to post a bond anywhere close to the amount required by the court order. They are still reviewing his assets, but I wanted to give you this update.

Thanks,

Stanley L. Garnett
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